IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

Debtor(s)

The Bank of New York Mellon, F/K/A The Bank of : CASE NO. 23-02223 MJC New York as trustee for registered Holders of CWABS, :

Inc., Asset-Backed Certificates, Series 2005-13

Movant

v.

Andrew Means

Debtor(s)

and

Jack N. Zaharopoulos

Trustee :

ANSWER TO MOTION FOR RELIEF ON BEHALF OF DEBTOR

AND NOW comes the Debtor, Andrew Means, by and through his attorneys, and answers the Motion for Relief from Automatic Stay by The Bank of New York Mellon, F/K/A The Bank of New York as trustee for registered Holders of CWABS, Inc., Asset-Backed Certificates, Series 2005-13, as follows:

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted.
- 6. Admitted.
- 7. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.
- 8. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.

- 9. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.
- 10. Denied. Legal conclusion to which no response is required.
- 11. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.

WHEREFORE, Debtor respectfully requests an Order of this Court denying the Motion of The Bank of New York Mellon, F/K/A The Bank of New York as trustee for registered Holders of CWABS, Inc., Asset-Backed Certificates, Series 2005-13 for Relief from the Automatic Stay.

Respectfully Submitted,

NEWMAN WILLIAMS, P.C.

By: /s/ Robert J. Kidwell, Esq.

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Attorney for Debtor

Date: January 8, 2024